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official capacity as Attorney General of the State of
California
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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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14 **NATIONAL ASSOCIATION FOR**
15 **GUN RIGHTS, INC., a non-profit**
16 **corporation; and Ronald Givens, an**
individual,

17 Plaintiffs,

18 v.

19 **ROBERT BONTA, in his official**
20 **capacity as Attorney General of the**
21 **State of California, and DOES 1-25,**
inclusive,

22 Defendants.
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Case No. 2:22-cv-04543-GW-PLAx

**JOINT STIPULATION TO
EXTEND TIME FOR
DEFENDANT TO RESPOND TO
THE FIRST AMENDED
COMPLAINT**

Courtroom: 9D

Judge: Hon. George H. Wu

1 Defendant Attorney General Rob Bonta and all Plaintiffs, by and through their
2 attorneys of record, stipulate as follows:

3 WHEREAS, on July 1, 2022, Plaintiffs filed their complaint in this action;

4 WHEREAS, on August 25, 2022, Plaintiffs filed their first amended complaint
5 in this action (the “Complaint”);

6 WHEREAS, on November 7, 2022, Plaintiffs served the Complaint on
7 Defendant;

8 WHEREAS, on November 10, 2022, Defendant filed a Stipulation Extending
9 Time to Respond to Initial Complaint by Not More Than 30 Days (L.R. 8-3), under
10 which Stipulation Defendant’s response date to the Complaint became December
11 28, 2022 (Dkt. No. 21);

12 WHEREAS, on November 30, 2022, an outside law firm retained by
13 Defendant released its independent report concerning the incident that is the basis
14 of the Complaint (oag.ca.gov/dataexposure);

15 WHEREAS, in light of the release of the independent report, Plaintiffs are
16 evaluating whether to seek leave to amend the Complaint;

17 WHEREAS, in the meantime, Defendant’s attorneys will be out of the office
18 for portions of the December 19-December 30, 2022 time period;

19 WHEREAS, while Plaintiffs are evaluating the independent report, and to
20 accommodate holiday-related absences, the parties hereby stipulate and request that
21 the Court enter an order extending Defendant’s time to respond to the Complaint
22 from December 28, 2022, to January 24, 2023;

23 WHEREAS, a [Proposed] Order approving this Stipulation is attached
24 herewith as required by Local Rules 7-1, 8-3, and 52-4.1;

25 NOW THEREFORE, THE PARTIES HEREBY STIPULATE AS
26 FOLLOWS, SUBJECT TO THE APPROVAL OF THE COURT:

27 Defendant shall have until January 24, 2023, to file and serve a response to the
28 Complaint.

1 IT IS SO STIPULATED.

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3 Dated: December 13, 2022

ROB BONTA
Attorney General of California
P. PATTY LI
Supervising Deputy Attorney General

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7 */s/ John W. Killeen*
JOHN W. KILLEEN
Deputy Attorney General
Attorneys for Defendant
Robert Bonta, in his official capacity
as Attorney General of the State of
California

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11 Dated: December 13, 2022

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14 */s/ Michael A. Columbo*
HARMEET K. DHILLON
MICHAEL A. COLUMBO
MARK P. MEUSER
DAVID A. WARRINGTON
GARY M. LAWKOWSKI
Attorneys for Plaintiffs
National Association for Gun Rights
and Ronald Givens

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20 I, John W. Killeen, hereby attest that all other signatories listed above concur
21 in this filing's content and have authorized me to make this filing.

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23 Dated: December 13, 2022

/s/ John W. Killeen
JOHN W. KILLEEN
Deputy Attorney General

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CERTIFICATE OF SERVICE

Case Name: **National Association for Gun
Rights, Inc. v. Rob Bonta**

No. **2:22-cv-04543**

I hereby certify that on December 13, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**JOINT STIPULATION TO EXTEND TIME FOR DEFENDANT TO RESPOND TO THE
FIRST AMENDED COMPLAINT**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on December 13, 2022, at Sacramento, California.

Ksenia Lavrushchak

Declarant

/s/ Ksenia Lavrushchak

Signature

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